

contact-tracing.pdf

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Dear Parents, Caregivers, & Members of the School Community -

As our nation and communities grapple with responding to the new reality of life with COVID-19 novel virus schools have been tasked with developing plans for mitigating COVID risk in the school building, and ensuring the safety of students, staff, faculty, and all shareholders in the student educational experience. To this end, we in administration and the school board have considered a number of alternatives in how we will handle COVID cases, mitigate COVID spread in the school and track and trace contacts of those who are infected with the larger school population.

One area of COVID response that has been discussed largely in both the public health space and in the general public space is how to best handle contact tracing. In our modern, post-cell phone world, a major topic of discussion which you have no doubt heard about, is the debate surrounding the use of contact tracing apps for mobile electronics devices. After careful consideration, we have decided that our school will not be utilizing contact tracing applications for electronic devices, and will use alternate methods of evaluating COVID transmission risk in the school building. We want to assure you that this decision was come to after considerable debate, and that we feel we have a robust system in place to reduce the spread of COVID in our community.

Because COVID is a topic of considerable public and personal health concerns, and because of the charged nature of this conversation in our current national environment we felt it was appropriate to not only share with you the methodology we will use in contact tracing, but to also explain why we have come to that decision.

How we will handle contact tracing -

Our school will utilize a combination of class tracking, student grouping, and camera footage to notify families of possible COVID contact. A “contact” in the case of COVID transmission has been defined as an individual being within 6 feet of a COVID positive individual for more than 10 minutes of time. We also feel it is a best practice to inform families of a contact event if students have been at distances of over 6 feet for a protracted period of time, such as a class period. As a result, families, staff and faculty will be notified in the following cases -

- A school community member shares a class with another community member who has tested positive for covid for a class period or longer. This will be determined by use of class rosters, and by use of security footage in shared spaces, such as the cafeteria and library.
- A school community member risks exposure during school provided transportation. This will be established using transportation rosters and security footage.

- A school community member is involved in exposure via other situations, such as extracurricular activities, social convergences or other events. In these cases the school will carry out an investigation involving rosters and footage where possible, and follow up with direct communication to resolve any ambiguities.
- All investigations will additionally follow most current health department guidelines and input.

Why we have come to this decision -

We have come to this decision based on a nexus of practical and legal considerations. While some schools may view tracking apps as a panacea for the COVID problem, we have identified a number of problems with this solution-

- All contact tracing solutions assume an “always on” environment for devices to be tracked. When considering applying this to the school environment, there are a number of problems with this assumption -
  - Student devices provided by the school may become depleted of charge resulting in them shutting down. In this case they will not track student movement.
  - Limiting student tracking to the school grounds is problematic at best. Partnering applications often rely on network access points to establish location. This can lead to intrusive observation when students are off school grounds but in the vicinity of the school.
  - NYS privacy standards for students severely limit the number of applications that are compliant with student information security.
  - Requiring students, staff, or faculty to use personal devices falls afoul of student data security requirements and/or employee privacy and use laws or regulations.
- Contact tracing via application can provide a false sense of safety and results in a false sense of security.
  - As mentioned above, devices which are powered down will not transmit information, as such, they can obscure contacts that other forms of tracing would show.
  - Some individuals may, for many reasons, attempt to spoof (alter) the location of a device that is being used to track the location of a school community member. This can result in both false positives and false negatives in tracking exposure events.

We hope you have found this communication meaningful and useful. If you have any lingering questions or concerns about our roll out of COVID contact tracing, please do not hesitate to contact us.

Thank you,

Rachel Kaufman, William LaMorie, Jing Xue, & Stacy Goldstein